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15 *Attorneys for Defendant Google LLC*

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19 CHASOM BROWN, WILLIAM BYATT,
20 JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
21 individually and on behalf of all similarly
situated,

22 Plaintiffs,

23 v.

24 GOOGLE LLC,
25 Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING
ADMINISTRATIVE MOTION TO SEAL
JOINT DISCOVERY STATEMENT
PURSUANT TO DKT. 133, 133-1**

Referral: Hon. Susan van Keulen, USMJ

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[PROPOSED] ORDER

Before the Court is Defendant Google LLC’s Administrative Motion to Seal portions of the parties’ Joint Discovery Statement submitted pursuant to the Court’s April 13 Discovery Order, Dkt. 133, 133-1 (the “Motion”). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document Sought to Be Sealed	Party Claiming Confidentiality	Court's Ruling on Motions to Seal	Basis for Sealing Portion of Document
Joint Discovery Statement, Joint Statement Regarding Class Member Identification (Chart A # P6)	Google	GRANTED as to redacted portions at 4:11-15, 4:17, 4:18-19, 4:27, 5:10, 5:14	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to the various types of unauthenticated identifiers/cookies Google uses internally and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Joint Discovery Statement, Chart B	Google	GRANTED as to redacted portions at 13 (P6, Plaintiffs RFP 10), 15-16 (P9, Plaintiffs RFP 86), 16-17 (P9, Plaintiffs RFP 87), 18 (P9, Plaintiffs RFP 92), 20 (P9, Plaintiffs RFP 128), 21-22 (P9, Plaintiffs RFP 129), 23 (P9, Plaintiffs RFP 130)	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to the various types of unauthenticated identifiers/cookies Google uses internally and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Joint Discovery Statement, Chart C	Plaintiffs	GRANTED as to redacted portions at pages 30-32 (Interrogatory No. 2), 36-37 (Interrogatory No. 5)	Contains, summarizes, or reflects material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order

1 **SO ORDERED.**
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3 DATED: _____
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HON. SUSAN VAN KEULEN
United States Magistrate Judge